For Settlement Purposes Only – Subject to FRE 408

CLEAN AIR ACT VIOLATIONS

Violation No.	Process Unit	Applicable Requirements	Description of Violation
WM01	1PR brown stock washer (also referred to as the No.	Before 1/1/10 Title V permit condition 17.	Failure to enclose and control HVLC emissions
	1 Pre Oxygen Washer)	MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(iii), 63.443(c),	
	,,,	63.450.	
		A.C. 1/1/10	
		After 1/1/10 Title V permit conditions 17.5, 17.6.1 and Table 17.5, 17.17.	
		MACT Subpart S: 40 C.F.R. §§ 63.447, 63.443(a)(1)(iii),	
		63.443(c), 63.450.	
WM02	2PR brown stock washer	Before 1/1/10	Failure to enclose and control HVLC emissions
	(also referred to as the No.	Title V permit condition 17.	
	2 Pre Oxygen Washer)	MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(iii), 63.443(c), 63.450.	
		03.430.	
		After 1/1/10	
		Title V permit conditions 17.5, 17.6.1 and Table 17.5, 17.17.	
		MACT Subpart S: 40 C.F.R. §§ 63.447, 63.443(a)(1)(iii), 63.443(c), 63.450.	
WM03	1PR brown stock washer	Before 1/1/10	Failure to Inspect/Repair Leaks
	(also referred to as the No.	Title V permit condition 17.	
	1 Pre Oxygen Washer)	MACT Subpart S: 40 C.F.R. §63.453(k).	
		After 1/1/10	
		Title V Permit Condition 17.23.	
		MACT Subpart S: 40 C.F.R. §§ 63.447, 63.453(k).	
WM04	2PR brown stock washer	Before 1/1/10	Failure to Inspect/Repair Leaks
	(also referred to as the No.	Title V permit condition 17.	
	2 Pre Oxygen Washer)	MACT Subpart S: 40 C.F.R. §63.453(k).	
		After 1/1/10	
		Title V Permit Condition 17.23.	
		MACT Subpart S: 40 C.F.R. §§ 63.447, 63.453(k).	

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WN01	1PR brown stock washer	Before 1/1/10	TRS emissions in excess of 5 ppm
,,,,,,,,	(also referred to as the No.	Title V permit condition 12.	The chassions in excess of 5 ppm
	1 Pre Oxygen Washer)	NSPS Subpart BB: 40 C.F.R. § 60.283(a)(1).	
	The Oxygen Washer)	1151 5 5dopart BB. 40 C.1 .R. § 00.205(a)(1).	
		After 1/1/10	
		Title V permit condition 13.2(a)(1).	
		NSPS Subpart BB: 40 C.F.R. § 60.283(a)(1).	
WN02	2PR brown stock washer	Before 1/1/10	TRS emissions in excess of 5 ppm
111102	(also referred to as the No.	Title V permit condition 12.	The chilistions in excess of 5 ppin
	2 Pre Oxygen Washer)	NSPS Subpart BB: 40 C.F.R. § 60.283(a)(1).	
	2 Tie Oxygen Washer)	1151 5 Subpart BB. 40 C.I. IX. § 00.205(a)(1).	
		After 1/1/10	
		Title V permit condition 13.2(a)(1).	
		NSPS Subpart BB: 40 C.F.R. § 60.283(a)(1).	
DM01	No. 1 sawdust digester	Before 1/1/10	Failure to enclose and control LVHC emissions
DIVIOT	1 to. 1 sawaust argester	Title V permit conditions 12.3 to 12.12, 17.	Tundre to energie und control E vite emissions
		MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(i), 63.443(c),	
		63.443(d); See also Questions and Answers for the Pulp and Paper	
		NESHAP Second Volume (40 CFR Part 63, Subpart S), pages 5-7.	
		(10 22 22 23 24 25 25 25 25 25 25 25 25 25 25 25 25 25	
		After 1/1/10	
		Title V Permit Conditions 17.1, 17.2, 17.3.	
		MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(i), 63.443(c),	
		63.443(d); See also Questions and Answers for the Pulp and Paper	
		NESHAP Second Volume (40 CFR Part 63, Subpart S), pages 5-7.	
DM02	No. 2 sawdust digester	Before 1/1/10	Failure to enclose and control LVHC emissions
		Title V permit condition(s) 12.3 to 12.12, 17.	
		MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(i), 63.443(c),	
		63.443(d); See also Questions and Answers for the Pulp and Paper	
		NESHAP Second Volume (40 CFR Part 63, Subpart S), pages 5-7.	
		After 1/1/10	
		Title V Permit Conditions 17.1, 17.2, 17.3.	
		MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(i), 63.443(c),	
		63.443(d); See also Questions and Answers for the Pulp and Paper	
		NESHAP Second Volume (40 CFR Part 63, Subpart S), pages 5-7.	